

Mr. Cesar Hage
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Re: Permit No. 7711A

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Mr. Cesar Hage
Plant Manager
GAF Materials Corporation
P.O. Box 655607
Dallas, Texas 75265-5607

Re: Permit Renewal
Permit No. 7711A
Asphalt and Roofing Materials
Manufacturing Facility
Dallas, Dallas County
Account ID No. DB-0378-S

Dear Mr. Hage:

This will acknowledge receipt of your application for renewal of the above-referenced permit and for your renewal fee in the amount of \$2,028. We have determined that your application is deficient, and additional information is needed to enable us to continue with our review. Please furnish the information indicated as follows:

1. Provide emissions (not currently permitted) for the natural gas-fired coating heater shown in the process diagram.
2. Provide products of combustion emissions (not currently permitted) for the stabilizer heater at Emission Point No. (EPN) 27.
3. Only one 1,200 cfm baghouse is permitted for EPN 26. Correct Table 1(a) to show EPN 26A and 26B separately.
4. Provide emissions for the sand silo and the granule silo.
5. Include standard exemptions, permit by rules, and standard permits that apply as required in 30 Texas Administrative Code (TAC) Section 116.116 (d)(2).

Also, please note that Texas Natural Resource Conservation Commission (TNRCC)

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has an internet site that has proven helpful to many air permit applicants. The site includes New Source Review Permits Division forms, tables, guidance documents and state air regulations. The address is http://www.tnrcc.state.tx.us/air/nsr_permits/nsrhome.htm.

An applicant for a permit renewal is required to submit information in support of the application which demonstrates that the requirements of 30 TAC Section 116.311(a) are met. In addition, the application must include information demonstrating that the facility is or has been in substantial compliance with the provisions of the Texas Clean Air Act (TCAA) Chapter 382 of the Texas Health and Safety Code and with the terms of the existing permit.

If the TNRCC determines that an applicant for the renewal of a permit has not demonstrated that all requirements for renewal have been met, additional actions by the TNRCC are required and will be forthcoming. First, the TNRCC will provide you notice that your facility does not meet the requirements for renewal; second, the TNRCC will set out in a report the basis for our determination; and third, the TNRCC will establish a schedule for you to follow in meeting the renewal requirements.

In the event that the Company does not satisfy the requirements specified in the report by the deadline set out in the schedule, the Company will be required to show cause in a contested case hearing why the permit should not expire immediately.

Such a "show cause" hearing is required by §116.314 and Section 382.055(g) of the TCAA. Failure of the Company to show cause will result in the immediate expiration of your existing permit.

When you receive authorization, you must publish notice of this application pursuant to Section 382.056 of the TCAA and §116.312. Requests for a public hearing may be received on your application as a result of the public notice. The requirement for the "show cause" hearing discussed above is distinct from the requirement for a public hearing, and each of these two types of hearings have their own requirements. Thus, we must advise you of the possibility that both of the two different hearings may be held on your permit renewal if a request for a public hearing is received. Of course, if the permit is rescinded in the "show cause" hearing, then there will be no need for a public hearing on the renewal.

The requirement for the "show cause" hearing is distinct from the requirement for a public hearing pursuant to Section 382.056 of the TCAA and §116.312 (which is held as a result of a request for a public hearing from a person who may be affected by emissions from the facility). Due to the outstanding public hearing request on this renewal application, a "show cause" hearing will further complicate the renewal process.

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of your permit. These two types of hearings, the contested public hearing and the "show cause" hearing, have their own requirements. Thus, we must advise you of the possibility that both of the two different hearings may be held on your permit renewal. Of course, if the permit is rescinded in the "show cause" hearing, then there will be no need for a public hearing on the renewal.

After receipt of the additional information, we will continue the review of your application. If the information furnished in response to this notice substantially complies with the request, but results in the need for further clarification or additional information, we will communicate that need as soon as possible. You are reminded that §116.116(a) states that all representations made in a permit application become conditions upon which a permit is issued. Any variation from these representations requires prior authorization from the TNRCC.

Thank you for your cooperation in this matter. If you have any questions, please call me at (512) 239-1351 or write to me at Texas Natural Resource Conservation Commission, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-162), P.O. Box 13087, Austin, Texas 78711-3087. It is of the utmost importance that you respond as quickly and thoroughly as possible to avoid the "show cause" hearing.

Sincerely,

Earl J. Jones, P.E.
Senior Permit Engineer
Mechanical and Combustion Section
Air Permits Division
Texas Natural Resource Conservation Commission

EJ/ss

cc: Mr. Tony L. Walker, Air Program Manager, Arlington
Mr. David Miller, Section Manager, Air Pollution Control Program, City of Dallas
Environmental and Health Services, Dallas
Ms. Tammy Fillo, Trinity Consultants, Dallas

AIR PERMITS DIVISION MC-162

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